

Attachment 1:
Comments for Quality Assurance Project Plan for Harmon Creek Processing Plant from MarkWest dated July 2019 related to the MarkWest Consent
Decree (no. 2:18-cv-00520-LPL)

Submitted by US Environmental Protection Agency (USEPA) Region 3 Air Section, Enforcement and Compliance Assurance Division
EPA Region 3 Air Quality Analysis Branch (AQAB), Air & Radiation Division
Pennsylvania Department of Environmental Protection (PADEP)

Element	Element No.	Page	Comment
Approvals Signatures and Roles/Responsibilities	A.1; throughout plan	A-1; throughout plan	Remove all EPA and PADEP signatures. EPA collectively will provide approval to the Monitoring and Quality Management Plan through a letter in consultation with PADEP. Update sections and tables reflect that roles and responsibilities will be conducted by EPA collectively in consultation with PADEP and no individual staff from the agency should be listed to perform the function.
Table of Contents	A.2	A-2	Update section titles, pages, and links to include all changes.
EPA Region 3 Enforcement Lead	A.4.3	A-9	Eliminate this section.
EPA Region 3 Quality Assurance Coordinators	A.4.4	A-9	Eliminate this section.
EPA Region 3 Monitoring Technical Lead	A.4.5	A-9	Eliminate this section.
Pennsylvania Department of Environmental Protection Quality Assurance Manager	A.4.6	A-9	Eliminate this section.
Pennsylvania Department of Environmental Protection Quality Assurance Manager	A.4.7	A-9	Eliminate this section.
Organizational Chart	Figure A.1	A-13	Revise the organizational chart so that it includes one box labeled, "EPA Region 3" with a dotted communication line to PADEP (include on same level). Eliminate all EPA and PADEP employees' names from the organizational chart.
Level 0 Data Validation	D.1.2	D-2	"MSI Trinity's QC software is validated in accordance with MSI Trinity's SOP 117 which is presented in Appendix C". SOP 117 is not included in Appendix C of this QAPP. Please add this SOP or describe software validation procedures.
Level 1 Data Validation	D.1.4	D-7	"For the air toxics, pollutant data between 0 and -10ppb are set to 0". The CD requires that the air toxics data be treated in accordance with the NATTS TAD. The NATTS TAD does not allow for zero substitution (see NATTS TAD section 3.3.1.3.15).